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February 12, 2020

Via Electronic Filing

The Honorable Magistrate Judge Robert W. Lehrburger
U.S. District Court, Southern District of New York
500 Pearl Street, Courtroom 18D
New York, NY 10007

Re: *Perez, Jr. v. 33rd Street Investors I LLC. et al*
Case No.: 19-cv-01392

Dear Honorable Magistrate Judge Lehrburger:

This law firm represents Defendant Wattle Cafe LLC (the “**Defendant**”) in the above-referenced action.

Pursuant to Your Honor’s Individual Motion Practice Rules I(A)(1) and I(F) this letter respectfully serves as a request to extend the parties’ deadline to complete mediation from February 12, 2020, to March 12, 2020. This request is made on consent of co-Defendant’s counsel and Plaintiff’s counsel.

The basis of this request is that Defendant is in the process of engaging substitute counsel. Defendant’s substitute counsel requires a short extension to familiarize themselves with the underlying facts in this action. Defendant’s substitute counsel has only recently informed the undersigned law office that they intend to appear in this action. For this reason, this request is being made less than forty-eight hours prior to the current mediation completion deadline.

A separate, independent basis also necessitates an extension of the mediation completion deadline. The parties scheduled expert site inspections of the subject premises are to be conducted in the next few weeks. Thus, the parties’ require a short extension of time of the mediation completion date in order to review the experts’ findings.

This is the second request of its kind. This request would not affect any other scheduled deadlines.

In light of the foregoing, Defendant respectfully requests that the mediation completion deadline be extended from February 12, 2020, to March 12, 2020.

Thank you, in advance, for your time and consideration.

Respectfully submitted,
LEVIN-EPSTEIN & ASSOCIATES, P.C.

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VIA ECF: All Counsel